

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
EUCLIDES SOTO, LOUIS A. MARTINEZ,)	NO.: 04-10892-JLT
JOSE RAMIREZ, CLEMENTE HERNANDEZ,)	
CESAR PIZARO, ELISON PENA,)	
JUAN COLON, JOSE ORTIZ,)	
RAFAEL TORRES, ANGEL BAEZ,)	
ANTONIO MARTINEZ, WILFREDO ORTIZ,)	
EULOGIO ORTIZ, MIRRAIN MIRANDA,)	
RAFAEL MORENO, NELSON ACEVEDO,)	
and RAMON RODRIGUEZ,)	
)	
Plaintiffs,)	
)	
v.)	
)	
UNITED STEELWORKERS OF AMERICA,)	
ITS LOCAL 421-U, ET. ALS.)	
)	
Defendants.)	
_____)	

(PROPOSED) ORDER

The plaintiffs propose the following order in lieu of the motion to enlarge discovery or strike part of the amended complaint:

1. To permit the depositions of four plaintiffs;
2. To produce for copying documents, if any not produced before, relevant to the action, as it now is amended, per the court order of March 6, 2006.
3. To complete discovery within 90 days, as no trial date has been scheduled.

Respectfully Submitted,

Date: April 21, 2006

/s/ Robert O. Berger

Robert O. Berger, BBO #: 038900

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CERTIFICATE OF SERVICE

I, Robert O. Berger, hereby certify that I have served a true and exact copy of the above document by electronic transfer or first class mail, postage prepaid on the following named persons:

Harold Lichten, Esq.

Alfred Gordon, Esq.

Pyle, Rome, Lichten, Ehrenberg & Liss-Riordan, PC

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(Electronic Transfer)

Theresa Merrill Stones, Esq.

United Steelworkers of America

Five Gateway Center

Pittsburgh, PA 15222

(First Class Mail)

Date: April 21, 2006

/s/ Robert O. Berger

Robert O. Berger (BBO #: 038900)